

Case No: 17-43890-ELM-13

**UNITED STATES BANKRUPTCY COURT**

NORTHERN DISTRICT OF TEXAS

Fort Worth Division

In re: ANGEL REE SANSOMCase No: 17-43890-ELM-13Chapter: 13Property Address: 2316 WESTBROOK DR, CARROLLTON, TX 75007Last four digits of any number you use to  
Identify the Debtor's account: 0390Court Claim No. (if known) 12**STATEMENT IN RESPONSE TO NOTICE OF AMOUNT DEEMED NECESSARY TO CURE  
MORTGAGE ARREARS UNDER L.B.R. 3002-2****FIRST UNITED BANK & TRUST**("Creditor") hereby responds to that certain Notice of Amount Deemed Necessary to Cure Mortgage Arrears ("Cure Notice") dated March 19, 2019 and filed as Docket 37 that as of the date of this response Creditor:**Pre-Petition Amounts  
Received**

Applicable option is checked

- ☒ Agrees that the Trustee has paid the amounts listed on the Cure Notice towards the Creditor's claim.
- ☐ Disagrees that the Trustee has paid the amounts listed on the Cure Notice towards Creditor's claim. Creditor states that the total amount received as of the date of this response is:

Total Amount Due: \$0.00

Attached is an itemized Statement of amounts paid through the date listed on the Statement.

**Post-Petition Amounts  
Outstanding**

Applicable option is checked

- ☐ Agrees that Debtors are current with respect to all post-petition payments, fees and costs, whether paid directly to Creditor or being paid through Debtor's Chapter 13 Plan as of the date of this response.
- ☒ Disagrees that Debtors are current with respect to all post-petition payments, fees and costs as of the date of the Cure Notice and states that the total amount to cure the post-petition arrearage as of the date of this response is:

Total Amount Due: \$12,752.48\* 

Attached is an itemized Statement of the post-petition arrearage due and owing through the date listed on the Statement. The outstanding amounts identified on the Statement do not reflect amounts that became or may become due after the date listed therein, including any fees that may have been incurred in the preparation, filing or prosecution of this Cure Notice.

The outstanding amounts identified on the attached Statements may not, due to timing, reflect all payments sent to Creditor as of the date stated therein. In addition, the amounts due may include payments reflected on the Notice of Amount Deemed Necessary to Cure Mortgage Arrears but which have not yet been received and/or processed by Creditor.

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## UNITED STATES BANKRUPTCY COURT

X /s/ PAUL KIM  
Signature

X 05/02/2019  
Date (MM/DD/YYYY)

First Name: PAUL Middle Name: Last Name: KIM

Title: Attorney for Creditor

Company BARRETT DAFFIN FRAPPIER TURNER & ENGEL, LLP

Address 4004 Belt Line Rd Ste. 100

City ADDISON State: TX Zip: 75001

Phone (972) 386-5040

## UNITED STATES BANKRUPTCY COURT

### CERTIFICATE OF SERVICE

I hereby certify that on May 02, 2019, a true and correct copy of the Statement in Response to Notice of Amount Deemed Necessary to Cure Mortgage Arrears Under L.B.R. 3002-2 was served via electronic means as listed on the Court's ECF noticing system or by regular first class mail to the parties listed on the attached list.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER  
TURNER & ENGEL, LLP

BY: /s/ PAUL KIM

05/02/2019

PAUL KIM  
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ATTORNEY FOR CREDITOR

## **UNITED STATES BANKRUPTCY COURT**

### **BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL:**

**DEBTOR:**

ANGEL REE SANSOM  
2315 WESTBROOK DRIVE  
CARROLLTON, TX 75007

**DEBTOR'S ATTORNEY:**

RICHARD M. WEAVER  
5601 AIRPORT FRWY.  
FORT WORTH, TX 76117

**TRUSTEE:**

PAM BASSEL  
7001 BLVD 26  
SUITE 150  
NORTH RICHLAND HILLS, TX 76180

**UNITED STATES TRUSTEE:**

1100 COMMERCE STREET  
ROOM 976  
DALLAS, TX 75242